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(Additional counsel listed on signature panel)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**STATE OF CALIFORNIA, by and through
Attorney General Xavier Becerra;
COUNTY OF LOS ANGELES; CITY OF
LOS ANGELES; CITY OF FREMONT;
CITY OF LONG BEACH; CITY OF
OAKLAND; CITY OF STOCKTON,**

Plaintiff,

v.

**WILBUR L. ROSS, JR., in his official
capacity as Secretary of the U.S.
Department of Commerce; U.S.
DEPARTMENT OF COMMERCE; RON
JARMIN, in his official capacity as Acting
Director of the U.S. Census Bureau; U.S.
CENSUS BUREAU; DOES 1-100,**

Defendants.

3:18-cv-01865

**STIPULATION TO ENLARGE TIME
RE: ATTORNEYS' FEES AND
COSTS; [PROPOSED] ORDER**

Dept: 3
Judge: The Honorable Richard G.
Seeborg
Trial Date: January 7, 2019
Action Filed: March 26, 2018

1 Plaintiff State of California, Plaintiff-in-Intervention Los Angeles Unified School District
2 (LAUSD and, collectively, “Plaintiffs”), and Defendants Wilbur L. Ross, Jr., U.S. Department of
3 Commerce, Ron Jarmin, and U.S. Census Bureau (collectively, “Defendants,” and together with
4 Plaintiffs, the “Parties”), by and through their respective attorneys of record, stipulate as follows:

5 1. Following entrance of the initial judgment in this case, the Parties stipulated, and this
6 Court ordered, that Plaintiffs’ deadline to file any motion for attorneys’ fees or bill of costs was
7 extended until after Defendants’ appeal was resolved and a final judgment was entered. *See* ECF
8 Nos. 212, 213.

9 2. This Court entered Final Judgment After Remand, Order of Vacatur, and Permanent
10 Injunction on August 1, 2019. Pursuant to the previous stipulation and order, the deadline to file
11 a motion for attorneys’ fees is currently September 3, 2019. *Id.*

12 3. Plaintiff State of California and Plaintiff-in-Intervention LAUSD filed their bills of
13 costs on August 15 and 16, 2019, respectively. ECF Nos. 241, 243. Defendants’ deadlines to file
14 objections to the bills of costs are currently August 29 and 30, 2019. *See* Local Rule 54-2.

15 4. The Parties are currently attempting in good faith to settle any claim for attorneys’
16 fees and costs in this action. In order to permit full and meaningful negotiations, the Parties
17 therefore jointly request a 10-day extension to September 13, 2019 for: 1) the deadline to file any
18 motion for attorneys’ fees; and 2) the deadline to file objections to Plaintiffs’ filed bills of costs.

19 5. This requested time modification would not have any effect on the schedule for this
20 case, other than slightly delaying any potential attorneys’ fees and costs proceedings.

21 **IT IS SO STIPULATED.**
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1 Dated: August 27, 2019

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7 /s/ Gabrielle D. Boutin
8 GABRIELLE D. BOUTIN
9 Deputy Attorney General
10 *Attorneys for Plaintiff State of California, by and*
11 *through Attorney General Xavier Becerra*

11 Dated: August 27, 2019

DANNIS WOLIVER KELLEY
SUE ANN SALMON EVANS
KEITH A. YEOMANS

13 /s/ Keith A Yeomans
14 Keith A. Yeomans
15 *Attorneys for Plaintiff-Intervenor*
16 *Los Angeles Unified School District*

16 Dated: August 27, 2019

17 JOSEPH H. HUNT
Assistant Attorney General
18 BRETT A. SHUMATE
Deputy Assistant Attorney General
19 CARLOTTA P. WELLS
Assistant Branch Director

21 /s/ Carol Federighi
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27 *Attorneys for Defendants*

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of this document has been obtained from all signatories above.

Dated: August 27, 2019

/s/ Gabrielle D. Boutin
GABRIELLE D. BOUTIN

[PROPOSED] ORDER

PURSUANT TO STIPULATION,

Upon consideration thereof, and good cause appearing, it is hereby ORDERED that the deadline to file any motion for attorneys' fees and the deadlines to file any objections to Plaintiffs' filed bills of costs (ECF Nos. 241 and 243) are hereby extended to September 13, 2019.

IT IS SO ORDERED.

Dated: _____

HON. RICHARD SEEBORG

CERTIFICATE OF SERVICE

Case Name: **State of California, et al. v.** No. **3:18-cv-01865**
Wilbur L. Ross, et al.

I hereby certify that on August 27, 2019, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**STIPULATION TO ENLARGE TIME RE: ATTORNEYS' FEES AND COSTS;
[PROPOSED] ORDER**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on August 27, 2019, at Sacramento, California.

Eileen A. Ennis
Declarant

/s/ Eileen A. Ennis
Signature